

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Bollinger Larose, LLC  
Bollinger Larose, LLC  
Larose, Lafourche Parish, Louisiana  
Agency Interest Number: 40832  
Activity Number: PER20030001  
Draft Permit 1560-00049-V1**

**I. APPLICANT:**

**Company:**  
Bollinger Larose, LLC  
P.O. Box 1410, Larose, LA 70373

**Facility:**  
Bollinger Larose, LLC  
1515 Hwy 24, Larose, Lafourche Parish, Louisiana  
Approximate UTM coordinates are 752.36 kilometers East and 3271.81  
kilometers North, Zone 15

**II. FACILITY AND CURRENT PERMIT STATUS:**

Bollinger Larose, LLC is an existing facility located in Lafourche Parish near Larose. Currently the site operates under Permit No. 1560-00049-V0 issued on December 14, 1998. Bollinger Larose LLC, an existing ship construction and repair facility, began operation in 1977.

**III. PROPOSED PERMIT / PROJECT INFORMATION:**

**Proposed Permit**

A permit application and Emission Inventory Questionnaire were submitted by Bollinger Larose, LLC on June 13, 2003, requesting a Part 70 operating permit. Additional information dated June 9, 2006, January 18, 2007, and February 16, 2007, was also received.

**Bollinger Larose, LLC  
Bollinger Larose, LLC  
Larose, Lafourche Parish, Louisiana  
Agency Interest Number: 40832  
Activity Number: PER20030001  
Draft Permit 1560-00049-V1**

With this modification, Bollinger Larose, LLC, proposes to:

- Establish a cap on the Toxic Air Pollutant (TAP) emissions produced by the facility
- Increase the amount of blast media used by and include metal TAPs in the blasting speciation for the Abrasive Blasting source (ARE 2)
- Increase the amount of paint used in the Painting Operations (ARE 1)
- Increase the capacity of the Welding (ARE 3) and Metal Cutting Operations (ARE 4)
- Increase the amount of diesel and heavy oil truck loading from the Truck Loading source (FUG 1)
- Remove Diesel Generator Engine (EQT 12)
- Add two emergency diesel generators (EQT 12 and EQT 15) and associated fuel tanks
- Update emissions using updated emission factors
- Reconcile various items

**Project Description**

Bollinger Larose, LLC is a marine vessel repair, maintenance, and construction facility that performs work on marine vessels, barges, and boats. New construction and repair includes work on hulls, decks, cabins, structural supports, and compartments. The facility also produces components for marine boats and barges. Activities at the facility include abrasive blasting, welding, metal cutting, and painting. These activities occur on vessels in dry docks, wet docks, outdoors in yard areas, and indoors in fabrication shops.

Gasoline and diesel storage tanks store fuel for facility equipment. Other portable tanks and containers store fuel and oil for use by various pieces of yard equipment. All storage tanks have fixed roofs.

Other facility activities include fuel, oil, and wash water truck loading, washing and venting of a vessel's fuel and/or cargo tanks, and operation of several combustion source. These include an emergency diesel generator engine, a winch engine, and several miscellaneous compressors, generators, and pumps that are on-site intermittently. Fugitive emissions are emitted from piping, flanges, valves, etc.

Section 6 of the Permit Application, dated June 6, 2006, lists the permitted emission rate before and after the project (in tons per year) for each emission point in the permit. These changes are summarized in the Permitted Air Emissions Section.

**Bollinger Larose, LLC  
Bollinger Larose, LLC  
Larose, Lafourche Parish, Louisiana  
Agency Interest Number: 40832  
Activity Number: PER20030001  
Draft Permit 1560-00049-V1**

**Permitted Air Emissions**

Estimated changes in permitted emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	2.66	33.48	+ 30.82
SO <sub>2</sub>	-	2.70	+ 2.70
NO <sub>x</sub>	0.20	46.69	+ 46.49
CO	0.03	10.15	+ 10.12
VOC	43.35	54.55	+ 11.20

**Prevention of Significant Deterioration Applicability**

The pollutants are not being increased by significant amounts by the project. Therefore, the proposed facility is not subject to the requirements of the PSD program.

This application was reviewed for compliance with the Louisiana Part 70 operating permit program, Louisiana Air Quality Regulations, NSPS, and NESHAP regulations.

**MACT Requirements**

Bollinger Larose, LLC is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. n-Butyl alcohol (Class III) is emitted in a quantity that is greater than the major source threshold. Barium (and compounds) (Class II), Chromium VI (and compounds) (Class I), copper (and compounds) (Class II), dibutyl phthalate (Class II), manganese (and compounds) (Class II), n-butyl alcohol (Class III), nickel (and compounds) (Class I), and zinc (and compounds) (Class III) are emitted in amounts that exceed their respective minimum emission rates (MER). This facility must address Maximum Achievable Control Technology (MACT).

The facility complies with the ambient air standards (AAS). MACT has been determined to be compliance with 40 CFR 63 Subpart II – National Emissions Standards for Shipbuilding and Ship Repair (Surface Coating) and with 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

**Air Modeling Analysis**

No dispersion modeling was performed.

**Bollinger Larose, LLC  
Bollinger Larose, LLC  
Larose, Lafourche Parish, Louisiana  
Agency Interest Number: 40832  
Activity Number: PER20030001  
Draft Permit 1560-00049-V1**

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

**Regulatory Analysis**

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the draft permit, or where provided, Tables 2, 3 and 4 of the draft permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the draft permit, or where provided, Tables 2, 3 and 4 of the draft permit.

**IV. Permit Shields**

There is no permit shield.

**V. Periodic Monitoring**

**Compliance Assurance Monitoring**

Federal regulation 40 CFR 64-Compliance Assurance Monitoring is not applicable to this facility.

**VI. Applicability and Exemptions of Selected Subject Items**

ID No:	Requirement	Notes
EQT 11	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum liquids for Which Construction, Reconstruction, or Modification Commences after June 11, 1973, and Prior to May 19, 1978. [40 CFR 60.110]	DOES NOT APPLY. Storage tank has volume of less than 40,000 gallons. [40 CFR 60.110(c)(1)]

**Bollinger Larose, LLC**  
**Bollinger Larose, LLC**  
**Larose, Lafourche Parish, Louisiana**  
**Agency Interest Number: 40832**  
**Activity Number: PER20030001**  
**Draft Permit 1560-00049-V1**

<b>VI. Applicability and Exemptions of Selected Subject Items</b>		
<b>ID No:</b>	<b>Requirement</b>	<b>Notes</b>
	NSPS Subpart Ka – Standards for Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. [40 CFR 60.110a]	DOES NOT APPLY. Storage tank was constructed prior to May 18, 1978. [40 CFR 60.110a(a)]
EQT 13	NESHAP Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	DOES NOT APPLY. Engine has a power output of less than 500 horsepower. [40 CFR 63.6590(a)]
EQT 14	NESHAP Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	DOES NOT APPLY. Engines covered under this cap are not stationary. [40 CFR 63.6585(a)]
EQTs 12-15	Emission Standards for Sulfur Dioxide [LAC 33:III.1503]	EXEMPT. Units emit less than 250 tons of SO <sub>2</sub> per year. [LAC 33:III.1503.C]
	NSPS Subpart III—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	DOES NOT APPLY. The model year of the engines is earlier than the 2007 model year. [40 CFR 60.4200(a)(1)(i)]
FUG 2	Marine Vapor Recovery [LAC 33:III.2108]	DOES NOT APPLY. Marine vapor loading operations have uncontrolled emissions of less than 100 TPY. [LAC 33:III.2108.A]

<b>VII. Streamlined Requirements</b>			
<b>Unit or Plant Site</b>	<b>Programs Being Streamlined</b>	<b>Stream Applicability</b>	<b>Overall Most Stringent Program</b>
Bollinger Larose, LLC	None	-	-

**Bollinger Larose, LLC  
Bollinger Larose, LLC  
Larose, Lafourche Parish, Louisiana  
Agency Interest Number: 40832  
Activity Number: PER20030001  
Draft Permit 1560-00049-V1**

## **VIII. Glossary**

**Best Available Control Technologies (BACT)** - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

**Carbon Monoxide (CO)** – A colorless, odorless gas which is an oxide of carbon.

**Grandfathered Status**- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

**Hydrogen Sulfide** - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

**Maximum Achievable Control Technology (MACT)** - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

**New Source Review (NSR)** - A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

**Nitrogen Oxides (NO<sub>x</sub>)** - Compounds whose molecules consists of nitrogen and oxygen.

**Nonattainment New Source Review (NNSR)** - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to

**Bollinger Larose, LLC  
Bollinger Larose, LLC  
Larose, Lafourche Parish, Louisiana  
Agency Interest Number: 40832  
Activity Number: PER20030001  
Draft Permit 1560-00049-V1**

ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub>- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulphur.

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.